

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAVID ROBERT-DANIEL SAYLOR, SR.,

INDICTMENT

Defendant.

_____ /

The Grand Jury charges:

COUNT 1

(Possession of an NFA Firearm)

On or about March 8, 2021, in Newaygo County, in the Southern Division of
the Western District of Michigan,

DAVID ROBERT-DANIEL SAYLOR, SR.

knowingly possessed a firearm, namely, a destructive device, that is, an improvised
explosive commonly known as a “pipe bomb,” not registered to him in the National
Firearms Registration and Transfer Record.

26 U.S.C. § 5861(d)

26 U.S.C. § 5841

26 U.S.C. § 5871

26 U.S.C. §§ 5845(a)(8), (f)

COUNT 2

(Possession of an NFA Firearm)

On or about March 8, 2021, in Newaygo County, in the Southern Division of the Western District of Michigan,

DAVID ROBERT-DANIEL SAYLOR, SR.

knowingly possessed a firearm, namely, a destructive device, that is, an improvised explosive consisting of a brass fitting wrapped in tape that contained an explosive material, not registered to him in the National Firearms Registration and Transfer Record.

26 U.S.C. § 5861(d)

26 U.S.C. § 5841

26 U.S.C. § 5871

26 U.S.C. §§ 5845(a)(8), (f)

Count 3

(Possession of a Stolen Firearm)

On or about March 8, 2021, in Newaygo County, in the Southern Division of the Western District of Michigan,

DAVID ROBERT-DANIEL SAYLOR, SR.,

knowingly possessed a stolen firearm, that is, a Beretta model ARX160 .22 caliber rifle, knowing and having reasonable cause to believe that the firearm was stolen, and the firearm had been shipped and transported in interstate commerce.

18 U.S.C. § 922(j)

18 U.S.C. § 924(a)(2)

18 U.S.C. § 921(a)

FORFEITURE ALLEGATION

(Counts 1 and 2)

The allegations contained in Counts 1 and 2 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 26, United States Code, Section 5872 and Title 28, United States Code, Section 2461.

Upon conviction of an offense in violation of Title 26, United States Code, Section 5861(d), as set forth in Counts 1 and 2 of this Indictment, the defendant, DAVID SAYLOR, SR., shall forfeit to the United States pursuant to Title 26, United States Code, Section 5872 and Title 28, United States Code, Section 2461, any firearms involved in the commission of the offense, including, but not limited to, the pipe bomb charged in Count 1 and the improvised explosive device charged in Count 2 which were both seized on or about March 8, 2021.

If any of the properties described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title

28, United States Code, Section 2461(c).

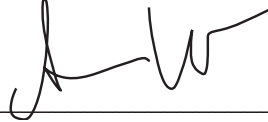
26 U.S.C. § 5872

21 U.S.C. § 853(p)

26 U.S.C. § 5861(d)

28 U.S.C. § 2461(c)

A TRUE BILL

A handwritten signature in black ink, appearing to be 'JW', written over a horizontal line.

GRAND JURY FOREPERSON

ANDREW BYERLY BIRGE

United States Attorney

A large, stylized handwritten signature in black ink, written over a horizontal line.

KRISTIN M. PINKSTON

Assistant United States Attorney